

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

UNITED STATES OF AMERICA,

Plaintiff,

v.

DAYLONTRE LAQWAN BROOKS,

Defendant.

Case: 1:22-cr-20587

Judge: Ludington, Thomas L.

MJ: Morris, Patricia T.

Filed: 11-09-2022 At 02:14 PM

Violations:

21 U.S.C. § 841(a)(1)

18 U.S.C. § 924(c)(1)(a)(i)

18 U.S.C. § 922(g)(1)

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

**Possession with intent to distribute fentanyl
21 U.S.C. § 841(a)(1) & 841(b)(1)(B)(viii)**

On or about September 1, 2022, in the Eastern District of Michigan,
Daylontre Laqwan Brooks, knowingly possessed with the intent to distribute 40
grams or more of a mixture or substance containing a detectable amount of
fentanyl, a Schedule II controlled substance, in violation of Title 21, United States
Code, Sections 841(a)(1) and 841(b)(1)(B)(vii).

COUNT TWO

**Possession of a firearm in furtherance of a drug trafficking crime
18 U.S.C. § 924(c)(1)(a)(i)**

On or about September 1, 2022, in the Eastern District of Michigan,
Daylontre Laqwan Brooks, knowingly possessed a firearm, that is, one Glock,

Model 17, 9mm caliber, semi-automatic pistol, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, possession with intent to distribute fentanyl, as alleged in Count One of this Indictment, in violation of Title 18, United States Code, Section 924(c)(1)(a)(i).

COUNT THREE
Felon in possession of a firearm
18 U.S.C. § 922(g)(1)

On or about September 1, 2022, in the Eastern District of Michigan, Daylontre Laqwan Brooks, knowing he had been convicted of an offense punishable by a term of imprisonment exceeding one year, knowingly possessed, in and affecting commerce, a firearm, that is, one Glock, Model 17, 9mm caliber, semi-automatic pistol, in violation of Title 18, United States Code, Section 922(g)(1).

FORFEITURE ALLEGATION

The allegations contained in Count One of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853(a). The allegations contained in Counts Two and Three of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c).

Pursuant to Title 21, United States Code, Section 853, upon conviction of an offense in violation of Title 21, United States Code, Section 841, the defendant shall forfeit to the United States: (1) any property, real or personal, constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense; and (2) any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offense.

Pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), upon conviction of any offense(s) in violation of Title 18, United States Code, Sections 922(g) and 924(c), the defendant shall forfeit to the United States any firearms and ammunition involved in or used in the knowing commission of the offense(s).

Dated: November 9, 2022

THIS IS A TRUE BILL

s/Grand Jury Foreperson
GRAND JURY FOREPERSON

DAWN N. ISON
United States Attorney

s/Anthony P. Vance
ANTHONY P. VANCE
Assistant United States Attorney
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s/Katharine Hemann
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Companion Case information MUST be completed by AUSA and initialedUnited States District Court
Eastern District of Michigan**Criminal Case Cover Sheet****Case Number**

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Companion Case InformationThis may be a companion case based upon LCrR 57.10 (b)(4)¹:☐ Yes☒ No

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Case Title: USA v. Daylontre Laqwan Brooks**County where offense occurred:** Saginaw County**Check One:** ☒ **Felony** ☐ **Misdemeanor** ☐ **Petty**

☒ Indictment/_____ Information --- **no** prior complaint.
 _____ Indictment/_____ Information --- based upon prior complaint [Case number:]
 _____ Indictment/_____ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information**Superseding to Case No:** _____ **Judge:** _____

- ☐ Corrects errors; no additional charges or defendants.
☐ Involves, for plea purposes, different charges or adds counts.
☐ Embraces same subject matter but adds the additional defendants or charges below:

Defendant name**Charges****Prior Complaint (if applicable)****Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.**

Date: November 9, 2022

s/Katharine Hemann

Katharine Hemann

Assistant United States Attorney

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¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.